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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Thanh Q. Dam and Ha Thu Ta,

Plaintiffs,

v.

William Barr, Attorney General,
Department of Justice, Kevin Maleenan,
Acting Secretary for the Department of
Homeland Security; Kenneth T. Cuccinelli
II, Acting Director, Citizen and Immigration
Services; Al Gallmann, District Director for
the Phoenix Citizenship and Immigration
Services; Jeanne M. Kent, Field Office
Director, Las Vegas Citizenship and
Immigration Services (collectively "Federal
Defendants");
Defendants.

Case No. 2:19-cv-01701-GMN-NJK

**Stipulation to Extend Deadlines
(Second Request)**

Pursuant to Local Rule IA 6-1, the parties request an extension of time to file their respective motion for summary judgment briefs. This motion is brought 20 days before the impending deadline on August 12, 2020; however, good cause exists for the requested extension.

This is an APA action wherein Plaintiffs challenge the denial of an application of citizenship. On July 13, 2020, the Federal Defendants filed a motion to file the administrative record under seal, along with an index and electronic version of the record. ECF No. 21. Per the Court's order (ECF No. 20), the parties must file their respective motions for summary judgment by August 12, 2020.

Counsel for the United States does not believe it is feasible to meet the upcoming deadline based on his upcoming schedule. Specifically, counsel for the United States will be out of town, without access to the file, between July 30 and August 6, 2020. The week of August 10th, counsel for the United States is scheduled to participate in settlement conferences in *Llamas v. United States*, case no. 2:18-cv-02202-RFB-DJA and *Watson v. United States*, case No. 2:16-cv-00608-RFB-DJA, and he is set to take multiple expert depositions. Counsel for United States does not believe he will have sufficient time to review the administrative file (which is over 3,000 pages) and prepare the brief before August 12, 2020. Moreover, this motion was not brought earlier because counsel was not certain whether the upcoming depositions and settlement conferences would go forward. Counsel for the United States has discussed a 30 day extension with Plaintiffs' counsel, who graciously agreed to the proposed extension. Accordingly, the parties request that the Court enter an order setting the following deadlines:

2. By September 11, 2020, the parties shall file their respective motion for summary judgment briefs.

3. By October 12, 2020, the parties shall file their respective briefs in opposition.

4. By November 12, 2020, the parties may file reply briefs, if necessary.

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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: July 27, 2020